



May 25, 2010

Steven G. Hall
Ecology and Environment, Inc.
720 Third Avenue, Suite 1700
Seattle, WA 98104

**Re: Results of a review of a Class I cultural resources assessment for the Avery Landing Project Area, Shoshone County, Idaho.
Applied Archaeological Research, Inc., Report No. 948.**

Dear Mr. Hall:

At your request, Applied Archaeological Research, Inc. (AAR) reviewed the draft version of a pre-field Class I cultural resources assessment prepared by Thomas Hoffert of Golder Associates Ltd. (Golder) on behalf of Potlatch Land and Lumber, LLC (Potlatch) for the Avery Landing site near Avery, Idaho. The site is the former location of a railroad roundhouse and maintenance facility used between 1907 and 1977 by the Chicago, Milwaukee, St. Paul & Pacific Railroad that is located on the bank of the St. Joe River. It is contaminated with petroleum hydrocarbons that persist in the subsurface as free product that are seeping to the St. Joe River. Because of the presence of the petroleum hydrocarbon contamination and related threats to human health and the environment, the Environmental Protection Agency (EPA) is currently pursuing a non-time-critical removal action (NTCRA) at the site to address the contamination. As a part of the NTCRA, the EPA directed that a cultural resources review be conducted for the site to ensure compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations, 36 CFR 800. AAR's review of the Golder report was performed to assist Ecology and Environment, Inc. (E & E) in providing technical oversight to the EPA. It was performed by Erica D. McCormick, M.Sc., RPA, and Bill R. Roulette, M.A., RPA.

The report includes an introduction and several chapters that include brief context statements related to the natural and cultural environment, a description of potential impacts, a description of proposed mitigation for impacts, a concluding section, a closure, and references cited. It was reviewed to determine whether the work performed is of suitable quality similar to other work of this type that EPA can rely on its findings. Then, based on the results presented in the Golder report, AAR is to provide recommendations and a scope of work outline for the necessary steps to complete the site cultural resources evaluation for Section 106 compliance.

Results of the Review

In AAR's opinion, the draft report is of marginal quality in terms of its content and its internal logic. It includes some information that the EPA can rely on but overall it suffers from a lack of clarity and direction.

The author (Hoffert 2010:ES-1) describes the Golder report as a Class I inventory and provides the following description of what that type of report entails: "an overview of State Historic Preservation Office (SHPO) files of all previous archaeological inventories and recorded sites located in the area of potential effect (APE) of the proposed project." The actual research in the Idaho SHPO files was performed by Glenda King, Curator of Archaeology at the Idaho SHPO. The results of the research are summarized in two tables in the report. The tables show that one site (referred to in the report as both site



10SE476 and as site 10SE479) is located at Avery Landing. AAR accepts the work of Ms. King as reliable. The part of the report, essentially Tables 2 and 3 in Chapter 4, that lists where previous archaeological work has been performed and where archaeological resources have previously been recorded provides the EPA with reliable information. Had the report gone no further, it would have fulfilled the requirements of a Class I inventory and our review comments would be of a very different nature. However, the report does not stop with a simple recap of all previous work done in the APE vicinity but rather presents an argument as to why there is no need to conduct any archaeological investigations at site 10SE476 (or 10SE479) prior to the NTCRA. However, after expressing this opinion the author completely alters his course by saying indeed archaeological investigations would be necessary should at some point the federal government become involved in the removal action.

Chapter 1, *Introduction*, describes the purpose of the Golder study and of Ms. King's research at the Idaho SHPO. Chapter 2 presents an environmental overview. Cultural resource management documents usually contain such sections and other than the author mis-conceptualizing the site's geologic setting and irregular use of capitalization, it is adequate.

Chapter 3 presents statements on the prehistory and history of the area and region. The section on the local history appears borrowed from another report that had as its subject matter Idaho mining. It also includes a section on the town of Avery that appears to have been plagiarized from the website cited in the text and from Wikipedia.

The Avery Landing site, the presumed topic of the Golder report, is first mentioned on the third page of the *Historic Period* (Chapter 3.2). It is described in one sentence and not mentioned again in the chapter, which goes on to discuss the history of the Chicago, Milwaukee, St. Paul & Pacific Railroad Company and the town of Avery.

As noted previously, Chapter 4 presents the results of Ms. King's research. This chapter would have been improved by the inclusion of a description of site 10SE476 (or 10SE479) located at proposed NCTRA site. One, in fact, wonders, whether the author actually reviewed the documentation form. Since later in the report (Chapter 6) the author builds a case arguing against the need for archaeological investigations at the site, it would be beneficial to know such basic things as: what the site consisted of when it was recorded; if it was recorded based on historical information or archaeological fieldwork; and if it is known to contain archaeological deposits.

The *Potential Impacts* chapter (Chapter 5) is a straightforward presentation of the options available for remediating the contaminated sediment at the site. It features standard compliance verbiage.

It is within the chapter titled *Proposed Mitigation for Potential Impacts* (Chapter 6) that we find the gist of the report. This chapter is actually mis-titled and it does not in fact describe any mitigative actions. It essentially lays out the author's argument as to why no archaeological investigations are needed at the site. The closest the author comes to actually suggesting how to lessen the impacts that could occur to site 10SE476 (or 10SE479) as a result of the NTCRA is to say that in the event that there is federal involvement in the project, Potlatch would hold on to any artifacts that were found so that they can be examined by a qualified historical archaeologist. This hardly qualifies as a description of the mitigation of the damage caused to a site.

It is in this chapter that the reader finally gets some information on site 10SE476 (or 10SE479). It is described as lacking any surface artifacts or other indications of the roundhouse and maintenance, repair, and fueling depot that once stood there. The chapter goes on to describe a series of activities that



have occurred at the site since Potlatch acquired it (or part of it, see below). The main point of the presentation it would seem is to rationalize the statement that “All of these previous industrial activities at the Site have caused any historic artifacts associated with site 10SE479 which may be buried within the fill to now lack provenience.” For a variety of reasons, this is a spurious claim.

First, it belies a misunderstanding of the archaeological concept of provenience. Of course artifacts found in the fill will have provenience. What they may or may not possess is their original historical provenience but even that is a trifling concern. If it can be established that artifacts found at the site originated at it, the fact that they are not where some railroad worked deposited them ca. 1920 is not critical in their having interpretive value.

The chapter seems to be placing the cart in front of the horse. It would have been better to start with a clearer description of the roundhouse and the types of activities that occurred there. Did railroad workers reside at roundhouse? Did they take meals there? Were there outdoor restrooms? The answers to these types of questions inform as to the material waste stream that was generated by use of the site. Also, it appears that no consideration was given to the potential that the facility included subgrade features. Essentially, there appears to have been little thought given to the archaeological potential of the site other than to stress the previous disturbances.

Those disturbances may or may not have destroyed archaeological deposits if they are present. Generally, the types of archaeological deposits that might be present at a site where people worked and may have conducted some domestic activities, such as eating meals, include surface or sheet middens and subsurface features. Sheet or surface middens accumulate around buildings as a result of casual discard practices and accidental losses. They also commonly contain debris from original construction events, remodeling events, and demolition events. Subsurface features include among other types, wells, privies, cisterns, and trash pits. These types of features have surface elements but typically extend well below the surface. The first three types listed often become filled with refuse after they are no longer used for their original purposes. Sheet middens are very susceptible to degradation by activities that disturb the ground surface. The types of earthmoving and industrial activities that have occurred at site 10SE476 (or 10SE479) almost certainly would have destroyed any sheet midden that was present. The same cannot be said for any features that may extend below the surface. The potential features of this type to be present cannot be assessed based on the Golder report.

Chapter 6 also makes the claim that since the Avery Landing site is privately owned, until there is a federal action, there are no county, state, or federal cultural resource compliance requirements to be met (Hoffert 2010:13). However, in the statement of work provided to AAR from E & E it is stated that the NTCRA site is only partly owned by Potlatch. According to a digital geospatial federal ownership database accessed by AAR part of the site is on land managed by the Forest Service. Does the Golder report refer specifically to the part of the site on Potlatch property, or the entire site? If the latter, the statement regarding compliance requirements is in error.

The concluding chapter (Chapter 7) starts by restating the results of the records review conducted by Ms. King at the Idaho SHPO. It includes the statement: “Site (10SE476) has purportedly been destroyed however subsurface remains and artifacts associated with the site may still exist within the fill. However, these possibly buried artifacts have been previously disturbed and as such lack precise provenience” (Hoffert 2010:16). This statement is confusing for a variety of reasons. First, who has purported that the site has been destroyed? There is no statement to that effect other than the author’s own. Secondly, after claiming that the site is purportedly destroyed, it is claimed that it may still exist archaeologically. Thirdly, what is the importance of the artifacts lacking precise provenience, and indeed,



what does that phrase mean? If the author intends to have the reader infer that because of the lack of “precise provenience” the site requires no archaeological investigation, the author is mistaken. Plow zone sites, landfill sites, and a variety of other archaeological site types are composed of artifacts that lack their original historical provenience but are nonetheless sources of much valuable information about the past. This apparently is not a strongly held opinion because reading further the author states that no archaeological investigations are needed as long as there is no federal involvement in the NTCRA: everything changes should the federal government become involved.

The remainder of the concluding chapter provides a list of tasks that are recommended to be conducted should Section 106 compliance become required. The recommendations are framed as necessary to complete “a cultural resources inventory” (Hoffert 2010:16). They include reviewing General Land Office maps, consultation with the affected Tribes, an intensive pedestrian survey, a determination of effect and associated recommendations, and the preparation and submission of a report. The recommendations are mostly appropriate. However, Avery Landing contains a recorded site and is described elsewhere in the report as lacking surface archaeological deposits or features (Hoffert 2010:13). With that information in mind, what is the purpose of conducting a pedestrian survey?

The final report elements are a closure and references cited section. Other than noting the heavy reliance on web-based resources, as revealed by a perusal of the latter, these sections do not warrant comment.

Recommendations

The other assignment tasked to AAR was to develop recommendations and a scope of work to bring the proposed removal project into compliance with Section 106.

The general requirement of Section 106 is that lead federal agencies make a reasonable and good faith effort to identify historic properties (important cultural and archaeological resources) in a project’s area of potential effect and work to resolve adverse effects to them.

This can be done in a number of ways. In a developed setting like the Avery Landing site, the process often begins with a record and literature review. The Golder report is such an example. When done well, such reviews are designed to gather information about the presence or absence of recorded cultural resources in and around a project area and about prehistoric, historical, and modern land uses of a project area. The source material is analyzed to assess the archaeological sensitivity of a property. For example, if it is determined that archaeological resources are found in similar settings all around a project area, the property would be assessed as having a high potential to contain similar resources. However, that potential could be decreased if it is determined that modern land use included developments and disturbances that may have damaged or destroyed archaeological resources if present. All of the factors are weighed in recommending whether and what type of field study is warranted. A field study could involve hand or mechanical excavations into the ground to locate archaeological deposits or construction monitoring to ensure that no historic properties are encountered during project-related earthmoving.

The Golder report has started this process but it does not go far enough in terms of its use of existing information. This gets back to its lack of the most basic information regarding site 10SE476 (or 10SE479). While it includes a description of past land uses, without consideration of what could be found at the site, the assessment that those disturbances “eliminates the need for an archaeological survey” is premature.



To assist the EPA in meeting its Section 106 obligations AAR makes the following additional recommendations:

- Determine the ownership/lessee or other surface management boundaries of the NTCRA at the Avery Landing site.
- Conduct research into the history of use of site 10SE476/10SE479. This research should focus on identifying the material waste stream related to its operations.
- Determine the location of site 10SE476/10SE479 relative to previous and proposed disturbances.
- Describe the level of disturbance related to each type of remediation option.
- Model the potential for archaeological resources to be present.
- Based on the preceding five tasks, determine if exploratory archaeological excavations are necessary. Such excavations are preferred over the pedestrian survey recommended in the Golder report as the site is already described as lacking surface archaeological deposits (Hoffert 2010:13). They could include backhoe trenches or surface scraping in areas identified based on the historical background research as having potential to contain buried archaeological deposits. These techniques are appropriately considered survey-phase work when applied to industrial or urban sites to locate subsurface archaeological features and deposits. Archaeologists involved in such work may need to have had hazardous material training.
- If exploratory excavations are determined not to be needed, determine if archaeological monitoring is needed at the time of project implementation.
- If cultural resources are identified during exploratory excavations or monitoring evaluate their eligibility to be listed on the NRHP. If found to be significant, determine effects and plan ways to mitigate them if adverse.
- Prepare a project report describing the results of the background research, an assessment of the archaeological potential of the project area, the results of any fieldwork, and recommendations, as appropriate.

Also, although not discussed up to this point in our review, the potential that prehistoric archaeological resources are present beneath the fill cannot be precluded based on current knowledge. Based on environmental factors, the landform on which the fill was placed has a high probability to contain prehistoric or other historic-era archaeological resources because it consisted mainly of a level terrace above the St. Joe River in a landscape of otherwise rugged terrain. Exploratory excavations, if performed, should extend below the fill so that the original ground surface can be observed. Likewise, if monitoring is conducted, it should continue until the native surface is reached.

Following these recommendations, and the appropriate ones made in the Golder report, it is AAR's opinion that the EPA will fulfill its Section 106 requirements.

Scope of Work

The above recommendations and the appropriate ones in the Golder report essentially constitute a scope of work. They can be used to propose several tasks that should be completed to assist the EPA in its Section 106 compliance.

Project Management, Coordination, and Consultation

The task would involve establishing and maintaining close communication with the EPA or its representative, E & E, land managing federal agencies, affected Tribes, and possibly representatives of



Potlach. It will also include determining the ownership/lessee or other surface management boundaries of the Avery Landing removal site. As part of this task it may be necessary for representatives of the cultural resources consulting firm contracted to conduct the work to travel to the project area to meet with project proponents and other affected parties. This task might also include preparation of permit applications should they be required to conduct the survey-level exploratory excavations

Project Research

This task would begin with obtaining the site 10SE476 (or 10SE479) documentation form and reviewing it for information that pertains to the site's potential to contain buried archaeological deposits. It would include visiting local and possibly state historical museums and repositories of historical records to obtain materials that shed light on the roundhouse, its use, and the activities that were conducted there. This research should also include a review of ethnographic sources, and possibly consultation with the affected Tribes, to determine if Native American sites are known to have been present at the site prior to its being filled.

This task would also include determining the location of site 10SE476/10SE479 relative to previous and proposed disturbances and estimating the level of disturbance related to each type of remediation option.

Archaeological Sensitivity Modeling

This task would involve an assessment of the potential that historic era and prehistoric archaeological deposits are present at the proposed removal site. It would be based on the background research in combination with the information on previous disturbances.

Fieldwork

An outcome of the archaeological sensitivity modeling would be a recommendation for the need for fieldwork. Since the site is described as lacking surface archaeological deposits, the fieldwork could include exploratory excavations or archaeological monitoring. Exploratory excavations could include backhoe trenches or surface scraping in areas identified as having potential to contain buried archaeological deposits. These techniques are appropriately considered survey-phase work when applied to industrial or urban sites. Archaeologists involved in such work may need to have had hazardous material training. Based on the archaeological sensitivity modeling it might be determined that archaeological monitoring at the time of project implementation is an appropriate measure. In this case, it would likely be necessary to prepare a monitoring plan.

If cultural resources are identified during exploratory excavations or monitoring their eligibility for listing on the NRHP must be evaluated. This step is complicated by the fact that archaeological deposits, if present, may be contaminated with petroleum hydrocarbons. It could involve hand or mechanical excavation and in-field or laboratory analysis. The specifics of any evaluation-phase fieldwork and analysis would need to be developed in consultation with the land managing agencies, the Idaho SHPO, and other affected parties.

Report Preparation

The project report should be prepared. It should include a description of the appropriate compliance issues, the project methods, and results. It should include a project area vicinity map showing



the project area location, a site map for any specific area where artifacts are found, and photographs showing the conditions of the project area the time of the investigation, work in progress, and representative artifacts, if found.

Closure

We hope that this review contains the information your firm needs to appropriately advise the EPA as what it needs to accomplish to fulfill its Section 106 obligations.

If you have any questions concerning AAR's review of the Golder report, our recommendations, or our scope of work, please contact the first author at 503-281-9451 or at bill@aar-crm.com. Thank you.

Sincerely,

Bill R. Roulette, M.A., RPA
Principle Investigator

Erica D. McCormick, M.Sc., RPA
Project Archaeologist/GIS Specialist

Reference Cited:

Hoffert, Thomas

2010 *Avery Landing Site Pre-Field Class I Cultural Resources Assessment*. Draft Report. Submitted to Potlatch Lumber, LLC, Spokane, WA. Prepared by Golder Associates, Calgary, Alberta.